

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 21-57 (PAM/HB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

(2) ELIFAA HENRY KINYAIYA,  
(3) VARBAR B. KANNEH,  
(4) ESKENDER M. YOUSUF,  
(5) ZELDA LIBERTY RUSSELL,  
(7) HODAN ABDI HASHI,  
(8) OMAR ALI OSMAN,  
(9) UBAH HASSAN HAGI,

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME**

Defendants.

The United States of America, by and through its attorneys, Charles J. Kovats, Jr., Acting United States Attorney for the District of Minnesota, and Angela M. Munoz, Assistant United States Attorney, respectfully moves the Court for a 2-day extension of time to file its responses to pretrial motions filed by Defendants Varbar B. Kanneh, Eskender M. Yousuf, Zelda Liberty Russell, Omar Ali Osman, and Ubah Hassan Hagi. The United States' response is due today, January 24, 2022. Due to an unexpected illness in the undersigned's family, the undersigned is requesting a brief extension. Defense counsel for Mr. Kanneh, Mr. Yousuf, Mr. Osman, and Ms. Hagi do not object to the extension request. Defense counsel for Ms. Russell did not respond due to being in trial in another matter. Accordingly, the United States respectfully requests an extension of time until January 26, 2022 for the United States to file its responses to the defendants' pretrial motions.

Dated: January 24, 2022

Respectfully submitted,

CHARLES J. KOVATS, JR.  
Acting United States Attorney

/s/ *Angela M. Munoz*

BY: ANGELA M. MUNOZ  
Assistant U.S. Attorney